

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	Case No.: 18-17422
	:	
Edward F. and Jessica A. Titus	:	
	:	
Debtors	:	Chapter 13

RESPONSE OF THE DEBTORS TO THE CERTIFICATE OF DEFAULT

In December, 2019 the Debtor paid all sums due and owing per the Notice of Default. The Debtor is also under the belief that he is fully current to the Movant. Lastly, the Debtor respectfully requests a post-petition mortgage statement.

WHEREFORE, Debtors, respectfully request that this Court deny an Order Granting Relief from the Automatic Stay.

/s/Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street, #502
The Philadelphia Building
Philadelphia, PA 19107
(215) 545-0008
Attorney for Debtor

Dated: January 21, 2020